

TRANSCRIPT

**STATES UNITED DISTRICT COURT
DISTRICT OF MASSACHUSETTS
C.A. NUMBER: 04-11924-RGS**

IAN J. BROWN, JAMES BROWN AND BARBARA BROWN,
Plaintiffs,

VS

UNITED STATES OF AMERICA,
VERIZON NEW ENGLAND, INC. AND BOSTON EDISON
COMPANY D/B/A NSTAR ELECTRIC,
Defendants.

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RULE 30(b)(6) DEPOSITION OF ADRIENNE M.  
ST. JOHN, taken on behalf of the Defendants,  
pursuant to the applicable provisions of the  
Massachusetts Rules of Civil Procedure, before  
Laurie J. Driggers, a Certified Realtime  
Reporter, Registered Professional Reporter and  
Notary Public in and for the Commonwealth of  
Massachusetts, at the Offices of Prince, Lobel,  
Glovsky & Tye, LLP, 585 Commercial Street,  
Boston, Massachusetts, on April 13, 2005,  
commencing at 9:37 a.m.



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1 private force main that takes the flow --  
2 the sewage flow from the Raytheon complex  
3 and pumps it up to this gravity sewer  
4 manhole. So in that section of Hartwell  
5 Road, there is sewer. And then if we go  
6 to the western part of Hartwell Road,  
7 there's sewer from approximately what I  
8 had earlier described as Sorens Way to  
9 Concord Road. So --

10 Q. And so is there a span where there  
11 is no sewer line under the road?

12 A. Yes. A short section between the  
13 Raytheon facility and the Sorens Way  
14 development.

15 Q. When that work was performed by the  
16 town, did the town need to get permission  
17 from Hanscom to open the street?

18 A. No.

19 Q. Okay.

20 A. Well, I don't know if we needed to,  
21 but we didn't.

22 Q. Okay. Do you know if the Bedford  
23 Police Department patrols Hartwell Road?

24 A. I would assume they do, yes. Yup.



1 Q. I don't want you to guess, but have  
2 you spoken -- in preparing for today's  
3 deposition, did you speak to anyone from  
4 the police department?

5 A. No.

6 Q. Okay. When the construction was  
7 done for the sewer line, do you know if  
8 the Bedford Police maintained any police  
9 details on that road?

10 A. They did.

11 Q. Okay. Are you aware of any other  
12 law enforcement agency that patrols  
13 Hartwell Road?

14 A. I don't know of any, no.

15 Q. When the construction -- This sewer  
16 project was completed two years ago. Are  
17 you aware of any other law enforcement  
18 agency that conducted a detail on Hartwell  
19 Road?

20 A. There were only Bedford detail  
21 officers.

22 Q. Are you aware of -- Do you know if  
23 the Bedford Police Department patrols the  
24 residential neighborhoods located on or off

